

ANNE E. PIERONI, ESQ.
Nevada Bar No. 9650
apieroni@righthaven.com
9960 West Cheyenne Avenue, Suite 210
Las Vegas, Nevada 89129-7701
Tel.: (702) 527-5900
Fax: (702) 527-5909

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

RIGHTHAVEN LLC, a Nevada limited-liability company,

Case No.: 2:10-cv-01343-RLH-PAL

Plaintiff,

V.

THOMAS A. DJIBIASE, an individual,

Defendant.

**MOTION AND PROPOSED ORDER TO
WITHDRAW AS COUNSEL OF RECORD
WITH CERTIFICATE OF SERVICE**

THOMAS A. DIBIASE, an individual,

Counterclaimant,

V.

RIGHTHAVEN LLC, a Nevada limited-liability company,

Counter-defendant.

ANNE E. PIERONI, ESQ. respectfully moves this court for an order permitting Anne Pieroni, Esq. ("Ms. Pieroni"), who has appeared in these proceedings, to withdraw as counsel for Righthaven LLC ("Righthaven"), in the above captioned matter, pursuant to Local Rule IA 10-6, S.C.R 46, and N.R.P.C 1.16 (b)(1) and (7). This Motion is made and based upon the Memorandum of Points and Authorities submitted herein, as well as the pleadings and papers on file herein.

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MEMORANDUM OF POINTS AND AUTHORITIES

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Ms. Pieroni is no longer employed as counsel at Righthaven. Furthermore, Ms. Pieroni
was not retained to represent Righthaven as outside counsel, in the above captioned matter, or
any other pending case or matter before this Court on behalf of Righthaven. The Local Rule IA
10-6 (a) provides that "No attorney may withdraw after appearing in a case except by leave of
court after notice served on the affected client and opposing counsel." Righthaven received
notice of Ms. Pieroni's intent to withdraw from this case, and all other Righthaven cases, upon
Ms. Pieroni's final week of employment with Righthaven.

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Additionally, the Defendant's counsel in this case will receive notice of this Motion to
Withdraw via the CM/ECF system, pursuant to the certificate of service attached herein.
Additionally, Local Rule IA 10-6 (e) provides that "no withdrawal... shall be approved if delay of
discovery, the trial or any hearing in the case would result." Here, no delay of any kind will
result from Ms. Pieroni's withdrawal because Righthaven is represented in this matter by
outside counsel, Shawn A. Mangano, Esq., having previously appeared before this Court, as well
as various in-house counsel employed by Righthaven. Ms. Pieroni's withdrawal will not
prejudice either party or delay any proceeding in this matter.

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CONCLUSION

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For the reasons set forth above, Ms. Pieroni respectfully moves this Court to enter an
Order approving the withdrawal of Ms. Pieroni as a counsel of record for Righthaven in the
above captioned matter.

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Dated this 6th day of April, 2011.

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By: /s/ Anne E. Pieroni, Esq.
ANNE E. PIERONI, ESQ.
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Nevada Bar No. 9650
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apieroni@righthaven.com
9960 West Cheyenne Avenue, Suite 210
23
Las Vegas, Nevada 89129-7701
Tel.: (702) 527-5900

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IT IS SO ORDERED:

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UNITED STATES DISTRICT JUDGE

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DATED: _____

CERTIFICATE OF SERVICE

Pursuant to Federal Rule of Civil Procedure 5(b), I hereby certify that on this 6th day of April, 2011, I caused a copy of the **MOTION AND PROPOSED ORDER TO WITHDRAW AS COUNSEL OF RECORD WITH CERTIFICATE OF SERVICE** to be served by the Court's CM/ECF system.

By: /s/ Anne Pieroni